

**FILED**

**UNITED STATES DISTRICT COURT**  
 for the  
 Western District of Texas

United States of America )  
 v. )  
 Moayad Heider Mohammad ALDAIRI ) Case No.  
 )  
 )  
 )  
 )

MAY 29 2018  
 CLERK, U.S. DISTRICT COURT  
 BY DEPUTY CLERK  
 WESTERN DISTRICT OF TEXAS

DR 18 - 641 M

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

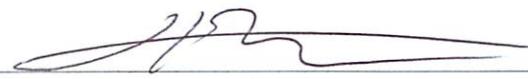
On or about the date(s) of Jul 1, 2017 through Dec 12, 2017 in the county of Maverick in the  
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 U.S.C. §§ 1324 (a)(1)(A)(v)(I), 1324(a)(1)(A)(i), & (B)(i) Conspiracy to Bring an Alien to the United States for Financial Gain	Any person who engages in any conspiracy to, knowing that a person is an alien, bring or attempt to bring, for the purpose of commercial advantage or private financial gain, to the United States in any manner whatsoever such person at a place other than a designated port of entry or place other than as designated by the Commissioner, regardless of whether such alien has received prior official authorization to come to, enter, or reside in the United States and regardless of any future official action which may be taken with respect to such alien.

This criminal complaint is based on these facts:

See attached affidavit for details.

Continued on the attached sheet.

  
 Complainant's signature

Haroldo Amorim, HSI Special Agent  
 Printed name and title

Sworn to before me and signed in my presence.

Date: 05/29/2018

City and state: Del Rio, Texas

  
 Collis White, United States Magistrate Judge  
 Printed name and title

## **AFFIDAVIT FOR AN ARREST WARRANT**

From on or about July 1, 2017 to December 12, 2017, Moayad Heider Mohammad ALDAIRI, a citizen of Jordan and legal resident of Mexico, conspired with others to smuggle Special Interest Aliens (SIA) into the United States from Mexico. Between October 31, 2017 and December 12, 2017, six (6) citizens of Yemen crossed illegally into the United States from Mexico thorough Eagle Pass, TX. The HSI interviews with the six (6) detained Yemenis revealed that each of them paid ALDAIRI varying amounts to be smuggled into the United States from Mexico. All six (6) Yemenis positively identified ALDAIRI from a six-pack photo lineup as the person who smuggled them into the United States from Mexico.